

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

IPXPHARMA, LLC,

Plaintiff,

v.

MILLENNIUM PHARMACEUTICALS, INC.,

Defendant.

Civil Action No. 3:14-cv-01545
Judge Aleta A. Trauger
Magistrate Judge Juliet Griffin

**DECLARATION OF LEIZEL A. CHING IN SUPPORT OF
DEFENDANT MILLENNIUM PHARMACEUTICALS, INC.'S
REPLY IN SUPPORT OF ITS MOTION TO TRANSFER VENUE
PURSUANT TO 28 U.S.C. § 1404(a)**

I, Leizel A. Ching, declare as follows:

1. I am over the age of 18 and have personal knowledge of the matters discussed in this declaration, except as to those matters stated on information and belief, which I believe to be true. I could and would competently testify regarding the matters discussed in this declaration if called to do so.

2. I am a member in good standing of the California State Bar. I am a senior associate at Wilmer Cutler Pickering Hale and Dorr LLP, counsel for defendant Millennium Pharmaceuticals, Inc. in this action. I am admitted to practice *pro hac vice* in the United States District Court for the Middle District of Tennessee.

3. Attached hereto as Exhibit Q is a true and correct copy of driving directions for the journey beginning at the business address for Karthik Gopalakrishnan at Duke University in Durham, North Carolina and terminating at the Middle District of Tennessee courthouse in Nashville, Tennessee. Exhibit Q indicates that the travel time is approximately 7 hours, 39

minutes. On September 22, 2014, this document was obtained from Google Maps at the following Internet address: <https://maps.google.com/>.

4. Attached hereto as Exhibit R is a true and correct copy of driving directions for the journey beginning at the residence address of Dr. Igor Roninson in Lexington, South Carolina, which was previously provided to the U.S. Patent and Trademark Office, and terminating at the Middle District of Tennessee courthouse in Nashville, Tennessee. Exhibit R indicates that the travel time is approximately 6 hours, 37 minutes. On September 22, 2014, this document was obtained from Google Maps at the following Internet address:

<https://maps.google.com/>.

5. Attached hereto as Exhibit S is a true and correct copy of driving directions for the journey beginning at Senex Biotechnology in Columbia, South Carolina and terminating at the Middle District of Tennessee courthouse in Nashville, Tennessee. Exhibit S indicates that the travel time is approximately 6 hours, 34 minutes. On September 22, 2014, this document was obtained from Google Maps at the following Internet address: <https://maps.google.com/>.

6. Attached hereto as Exhibit T is a true and correct copy of driving directions for the journey beginning at Millennium Pharmaceuticals in Cambridge, Massachusetts and terminating at the District of Massachusetts courthouse in Boston, Massachusetts. Exhibit T indicates that the travel time is approximately 12 minutes. On September 22, 2014, this document was obtained from Google Maps at the following Internet address:

<https://maps.google.com/>.

I declare under penalty of perjury under the laws of the United States and the State of Tennessee that the foregoing is true and correct to the best of my knowledge.

Executed this 22nd day of September, 2014.

A handwritten signature in black ink, appearing to read 'Leizel A. Ching', written over a horizontal line.

Leizel A. Ching

CERTIFICATE OF SERVICE

I hereby certify that, on this the 24th day of September, 2014, a true and correct copy of the foregoing was filed electronically with the U.S. District Court for the Middle District of Tennessee. Notice of this filing was served via the court's electronic filing system on all counsel listed below:

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